1 THE HONORABLE RICHARD A. JONES 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 BLACK LIVES MATTER SEATTLE-No. 2:20-cy-887 KING COUNTY, ABIE EKENEZAR, 10 SHARON SAKAMOTO, MURACO DECLARATION OF DAVID A. PEREZ IN KYASHNA-TOCHA, ALEXANDER SUPPORT OF PLAINTIFFS' RESPONSE 11 WOLDEAB, AND ALEXANDRA CHEN, TO MOTION FOR RECONSIDERATION 12 Plaintiffs, 13 v. 14 CITY OF SEATTLE, 15 Defendant. 16 17 I, David A. Perez, declare and state as follows: 18 1. The information contained in this declaration is true and correct to the best of my 19 knowledge, and I am of majority age and competent to testify about the matters set forth herein. 20 2. I am a partner at Perkins Coie LLP, and I serve as lead counsel for Plaintiffs 21 Black Lives Matter Seattle-King County, Abie Ekenezar, Sharon Sakamoto, Muraco Kyashna-22 Tochá, Alexander Woldeab, and Alexandra Chen in the above-entitled action. I submit this 23 declaration in support of Plaintiffs' Response to Motion for Reconsideration. 24 3. Prior to filing its Motion for Reconsideration and Leave to Supplement the 25 Record, the City did not meet and confer with Plaintiffs' counsel—or even seek to meet and 26 confer. In fact, the City did not so much as provide Plaintiffs' counsel advance notice of this

D. PEREZ DECL. ISO RESPONSE TO MOTION FOR RECONSIDERATION (No. 2:20-CV-00887-RAJ) –1 150615903.1

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1	Motion; the very first time Plaintiffs learned about the motion was when counsel received notice
2	via the ECF system.
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4	Executed this 29th day of December 2020 at Seattle, Washington.
5	I declare under penalty of perjury under the laws of the United States and the State of
6	Washington that the foregoing is true and correct.
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8	By: s/ David Perez
9	DAVID A. PEREZ
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